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DEPT. OF TRANSPORTATION
DOCKETS



December 31, 2003

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Docket Facility
US Department of Transportation
Room PL-401
400 Seventh Street, SW
Washington, DC 20590-0001

RSPA-03-16330-11

Re: Docket No. RSPA-03-16330; Notice 4
Request for Information – Passage of Internal Inspection Devices
Request for 30-day Extension of Comment Period

The referenced notice, published in the Federal Register on December 1, 2003, requested written responses to be submitted by December 31, 2003, answering questions regarding the current status on feasibility of making new offshore gas transmission lines NPS 10 and larger piggable. In reviewing the preamble comments of the Final Rule (Amendment 192-72) and the INGAA Petition for Reconsideration of this final rule dated May 10, 1994, we found that there was inadequate information from which a proper response could be generated.

As a major offshore natural gas transmission pipeline operator, this issue is of importance to us. El Paso Pipeline Group (EPPG) requests a 30-day extension to the comment period to allow us to research the original objections to the application of 192.150 to these offshore transmission lines.

Amendment 192-72 was noticed as a final rule on April 12, 1994. The preamble documents numerous technical concerns regarding the applicability of the final rule to offshore pipelines (192.150 for gas transmission lines). Even though the technical arguments and recommendation for excluding offshore pipelines from the rule had the support of the Technical Pipeline Safety Standards Committee and the Technical Hazardous Liquids Pipeline Safety Standards Committee, RSPA/OPS disagreed without providing a technical basis for doing so. EPPG believes some or all of those technical issues may still be valid for operators of offshore natural gas pipelines.

The INGAA Petition for Reconsideration of the final rule reiterates some of the concerns documented in the preamble and also makes reference to certain technical material provided to RSPA/OPS supporting the position of exempting offshore pipelines from the rule.

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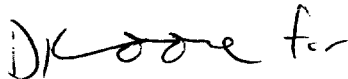
Although a copy of the Petition was found on the DOT's online Document Management System, we were unable to locate any documentation of the technical material. We believe consideration of this technical material is important to our response and request a copy be posted on the docket for consideration by all affected parties.

Additionally, in this notice RSPA/OPS refers to a 1994 Marine Board study which addresses the design of new medium to large offshore pipelines to accommodate smart pigs. RSPA/OPS also notes that hazardous liquid pipeline operators are currently able to comply with the requirement of making these lines piggable. We believe that in order to adequately address the technical feasibility issues raised by the questions, we would need to review the report to understand how hazardous liquid pipeline operators were able to overcome their concerns.

Without the ability to review these documents, combined with insufficient time to adequately prepare comments, we continue to support the concerns INGAA outlined in the Petition for Reconsideration.

Because of the amount of materials that still need to be researched and reviewed, we believe that a 30-day extension would be reasonable. Thank you for considering our request.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "John S. Chin", with a stylized flourish at the end.

Mr. John S. Chin
Principal Compliance Engineer
DOT Compliance Services
El Paso Pipeline Group